May 28, 2014

Sharon L. Summers Planning & Policy Development Unit Division of Social Services 1901 North DuPont Highway P. O. Box 906 New Castle, DE 19720-0906

RE: DSS Proposed Determining Technical Eligibility for Child Care Assistance Regulation [17 DE Reg. 1038 (May 1, 2014)]

Dear Ms. Summers:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Social Services (DSS) proposal to adopt changes to the eligibility standards for persons seeking subsidized child care assistance funded by the federal Child Care Development Fund. Council **endorses** the proposed changes subject to consideration of the amendments listed below since the initiative expands eligibility to individuals participating in educational programs.

First, Council would suggest additional review of the punctuation in the regulation.

Second, the Council suggests the reference to the GED program be revised. The Delaware Department of Education (DOE) has recently expanded the scope of tests equivalent to the traditional GED as seen in the attached 17 DE Reg. 724 (January 1, 2014). The DOE now uses the term "secondary credential assessment". Therefore, DSS may wish to adopt the following reference in Section 1.A.9: "Enrolled and participating in a General Education Diploma (GED) program or similar secondary credential assessment approved by the Delaware Department of Education."

Thank you for your time and consideration in reviewing our observations. Please feel free to contact me or Wendy Strauss should you have any questions.

Sincerely,

Terri A. Hancharick

TAH:kpc

Attachment